

1 James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com

2 M. Magali Mercera, Esq., Bar No. 11742
MM@pisanellibice.com

3 PISANELLI BICE PLLC
400 South 7th Street, Suite 300
4 Las Vegas, Nevada 89101
5 Telephone: 702.214.2100
Facsimile: 702.214.2101

6 Joanna R. Travalini, Esq. (*pro hac vice* forthcoming)
jtravalini@winston.com

7 WINSTON & STRAWN LLP
8 35 W. Wacker Drive
Chicago, IL 60601-9703
Telephone 312.558.3256
9 Facsimile: 312.558.5700

0 Seth C. Farber, Esq. (*pro hac vice* forthcoming)
sfarber@winston.com

1 WINSTON & STRAWN LLP
2 200 Park Avenue
New York, NY 10166-4193
3 Telephone: 212.294.4611
Facsimile: 212.294-4700

4 *Attorneys for Defendants*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

v.

MICHAEL B. ZIPPRICH; AMERICA'S
REHAB CAMPUSES, LLC; AMERICA'S
REHAB CAMPUSES-ARIZONA, LLC; and
ARIZONA REHAB CAMPUS, LLC,

Defendants.

CASE NO.: 2:20-cv-02308-JCM-DJA

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO ANSWER FIRST
AMENDED COMPLAINT**

1 Plaintiff United States Securities and Exchange Commission ("SEC") and Defendants
2 Michael B. Zipprich ("Zipprich"), America's Rehab Campuses, LLC ("ARC"), America's Rehab
3 Campuses-Arizona, LLC ("ARC-AZ"), and Arizona Rehab Campus, LLC ("ARC-OP")
4 (collectively, the "Parties"), by and through their respective counsel of record, agree as follows:

5 1. The SEC filed its Complaint in the instant action on December 21, 2020.
6 (ECF No. 1);

7 2. The SEC filed its First Amended Complaint in the instant action on January 14,
8 2021. (ECF No. 4);

9 3. The SEC served requests to waive service of summon on Mr. Zipprich, ARC,
10 ARC-OP, and ARC-AZ on or about January 26, 2021;

11 4. Counsel for Mr. Zipprich, ARC, ARC-OP, and ARC-AZ returned executed
12 Waivers of the Service of Summons on or about February 9, 2021 (ECF Nos. 5-8.);

13 5. The deadline to answer or otherwise respond to the First Amended Complaint is
14 March 29, 2021;

15 6. In light of the foregoing, the Parties STIPULATE AND AGREE, subject to this
16 Court's approval, that the time for Mr. Zipprich, ARC, ARC-OP, and ARC-AZ to answer or
17 otherwise respond to the First Amended Complaint in this action shall be extended; and

PISANELLI BICE
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

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1 7. Mr. Zipprich, ARC, ARC-OP, and ARC-AZ shall answer or otherwise respond to
2 the First Amended Complaint in this action by or before April 12, 2021.

3 Dated this 24th day of March, 2021.

4 PISANELLI BICE PLLC

5 By: /s/ M. Magali Mercera

6 James J. Pisanelli, Esq., #4027
7 M. Magali Mercera, Esq., #11742
8 400 South 7th Street, Suite 300
9 Las Vegas, Nevada 89101

10 WINSTON & STRAWN LLP
11 Joanna R. Travalini, Esq.
12 (pro hac vice forthcoming)
13 35 W. Wacker Drive
14 Chicago, IL 60601-9703

15 Seth C. Farber, Esq.
16 (pro hac vice forthcoming)
17 200 Park Avenue
18 New York, NY 10166-4193

19 *Attorneys for Defendants*

20 Dated this 24th day of March, 2021.

21 SECURITIES AND EXCHANGE
22 COMMISSION

23 By: /s/ Terry R. Miller

24 Terry R. Miller, Esq. (admitted *pro hac vice*)
25 Securities and Exchange Commission
1961 Stout Street, Suite 1700
Denver, CO 80294

26 *Attorney for Securities and Exchange
27 Commission*

PISANELLI BICE
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

28 **ORDER**

1 IT IS SO ORDERED that Defendants shall answer or otherwise respond to the First
2 Amended Complaint in this action on or before April 12, 2021.



21 UNITED STATES MAGISTRATE JUDGE

22 DATED: March 25, 2021

23 CASE NO. 2:20-cv-02308-JCM-DJA